IN THE DISTRICT COURT OF THE UNITED STATES FOR THE MIDDLE DISTRICT OF ALABAMA NORTHERN DIVISION

UNITED STATES OF AMERICA)	
)	
V.)	CR. NO. 2:05cr270-LSC
)	
ANGELA MICHELLE WILLIAMS)	

<u>UNITED STATES MOTION FOR</u> DOWNWARD DEPARTURE FOR SUBSTANTIAL ASSISTANCE

Comes now the United States of America, by and through Leura G. Canary, United States Attorney for the Middle District of Alabama, and pursuant to Section 5K1.1 of the United States Sentencing Guidelines, respectfully requests this Honorable Court to sentence Angela Michelle Williams to a term of one year probation, and as reasons therefore, submits the following:

- 1. The United States herein states that Williams has provided substantial assistance in the investigation of others involved in federal crimes within the Middle District of Alabama. In connection with the government's investigation of the instant offense, when first confronted by the government, Williams provided a statement that implicated herself and another individual, Crystal Phillips. This statement was part of the information that led to Phillips' indictment. (*United States v. Crystal Phillips*, No. 2:05cr268-WHA (trial scheduled for June 26, 2006)).
- 2. Williams has made herself available for subsequent debriefings and the United States submits that she has, at all times, been truthful with federal investigators.
- 3. As part of the plea agreement, Williams has waived her right to appeal and/or collaterally attack the sentence imposed in this case.

Wherefore, premises considered, the United States moves this Honorable Court to impose a sentence of one year probation.

Respectfully submitted this the 16th day of May, 2006.

LEURA G. CANARY UNITED STATES ATTORNEY

/s/ Andrew O. Schiff ANDREW O. SCHIFF Assistant United States Attorney Post Office Box 197 Montgomery, Alabama 36101-0197 334.223.7280 334.223.7135 fax andrew.schiff@usdoj.gov

IN THE DISTRICT COURT OF THE UNITED STATES FOR THE MIDDLE DISTRICT OF ALABAMA NORTHERN DIVISION

UNITED STATES OF AMERICA)	
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v.)	CR. NO. 2:05cr270-LS0
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ANGELA MICHELLE WILLIAMS)	

CERTIFICATE OF SERVICE

I hereby certify that on May 16, 2006, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following: Sydney Albert Smith, Esq.

Respectfully submitted,

LEURA G. CANARY **UNITED STATES ATTORNEY**

/s/ Andrew O. Schiff ANDREW O. SCHIFF Assistant United States Attorney Post Office Box 197 Montgomery, Alabama 36101-0197 334.223.7280 334.223.7135 fax andrew.schiff@usdoj.gov